

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

UNITED STATES OF AMERICA	§	
	§	
v.	§	CRIMINAL NO. 1:23-CR-00183
	§	
WENDINBOUDE OUEDRAOGO	§	

**DEFENDANT’S SENTENCING MEMORANDUM**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW Defendant, through Counsel and submits evidence relevant to sentencing in pursuit of a downward variance from the applicable Sentencing Guidelines.

I.

Objections

Defendant objects to paragraphs 57, 58 and 92 in that they calculate him to have 2 Criminal History Points, making him a Criminal History Level 2. The second point recommended in the PSI is for a guilty plea that occurred after Defendant had pled guilty in the instant case, and for conduct that was committed after the offenses committed in the instant case.

For these reasons, Defendant very respectfully asks that the second point not be included in the assessing punishment in this case and that paragraph 92 state the corrected range of punishment as 63 – 78 months.

II.

Request for Recommendations

Defendant very respectfully requests that This Honorable Court recommend that he be designated to the Bureau of Prisons facility in Bastrop, Texas, the one closest to his home, so that

his family may more easily visit him.

Further, Defendant very respectfully that Your Honor order that the sentence in the instant case shall run concurrently with his sentence in the pending case in the District of Minnesota.

### III.

#### Conclusion

For the reasons stated above, Defendant very respectfully requests that he receive the requested relief and recommendations, and that his sentence be ordered to run consecutively with the sentence in the case now pending in the U. S. District Court for the District of Minnesota.

Very respectfully,

*/S/ Guy L. Womack*

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#### CERTIFICATE OF SERVICE

A copy of the foregoing was delivered via email to Government Counsel on this 11<sup>th</sup> day of March, 2024.

*/S/ Guy L. Womack*  
Guy L. Womack